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March 10, 1989

Mr. R.J. Ramsey  
Barney's Canyon Mine  
P.O. Box 311  
Bingham Canyon, Utah 84006-0311

Re: B.P. Minerals  
Barney's Canyon Project  
Plan Review Comments

Dear Mr. Ramsey:

We have reviewed your response dated 14 February 1989 to 24 questions raised earlier by us based on the review of the project file and other information submitted to date. Our comments and statements in the matter are as follows:

1. Mr. Tracy Braun of your staff at our 28 February 1989 meeting stated that the Barney's Canyon project will be shut down during the winter months. Assurances must be presented to establish that the process fluid inventory will be drawn down adequately and the process ponds will contain all fluids under the design hydraulic conditions which the process ponds may experience.
2. As discussed in our 28 February 1989 meeting, township, range and section corners will be added to the general orientation drawing for the project. Also it is understood that pads which will be constructed after pad BC-1 will be located on the ground within 100 feet of dimensions shown on this drawing.
4. We note that the ground water monitoring wells will be installed and sampled prior to the initiation of operations for the BC-1 pad. Sampling will be as described in previous letter.
6.
  - a. An operation and maintenance manual must at a minimum meet the requirements outlined in 6.a of our 30 January 1989 letter. It must be submitted in an approvable form prior to the initiation of operations.
  - b. A contingency plan meeting as a minimum requirements outlined in 6.b of our 30 January 1989 letter must be submitted in an approvable form prior to the initiation of operations.
  - c. A closure plan including neutralization criteria for abandonment of heap leach spent ore piles and process ponds will be submitted in an approvable form prior to initiating neutralization procedures.

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6. With reference to item 6 (in our 30 January 1989 letter), we were informed in the 28 February 1989 meeting that culverts were not found during "rough grading" construction of the process ponds beneath the railroad grade.
11. The operational life of each heap leach pad liner system for the Barney's Canyon project will be ten (10) years as discussed in the 3 March 1989 meeting. The overall project life is limited to 15 years.
21. Mr. Tracy Braun of your staff stated in the 28 February 1989 meeting that excess pumping capacity will be installed for the Barren Solution Pond and Booster Station pumping facilities. In addition, spare pumps will be kept onsite throughout the life of the project for these pump facilities.

We appreciate your timely responses and cooperation.

Please feel free to contact Charlie Dietz of my staff if there are any concerns or questions.

Sincerely,

Utah Water Pollution Control Committee



Don A. Ostler, P.E.  
Executive Secretary

CGD/ag

cc: Ms. Cindy Emmons, B.P. Minerals  
Mr. Kent Miner, Salt Lake City/County Health Department  
Mr. Brian Buck, JBR Consultants  
Mr. Lowell Braxton, Oil, Gas, and Mining  
Mr. Ross Pino, 310 East State Highway, Copperton, Utah 84006  
Mr. Steve Harris, Magna Area Elected Council, Magna, Utah 84044  
Mr. Blaine Milner, Chairman, Copperton Improvement District, Copperton, Utah

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